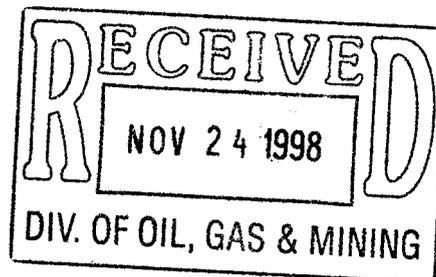




Consolidation Coal Company
 Illinois/West Kentucky Operations
 State Route 148 North
 Post Office Box 566
 Sesser, IL 62884
 (618) 625-2041
 Fax: (618) 625-6844

November 23, 1998

Mr. Daron Haddock, Permit Supervisor
 Utah Coal Regulatory Program
 1594 West North Temple, Suite 1210
 P.O. Box 145801
 Salt Lake City, Utah 84114-5801



RE: Midterm Permit Review Requirements
 Consolidation Coal Company, Emery Deep Mine
 ACT 015/015, File #3, Emery County, Utah

Dear Mr. Haddock:

2 Daron

This letter is in response to the Division's letter of September 17, 1998 requesting the company to address deficiencies found during the midterm review. We trust that the information contained within this submittal will answer and satisfy these deficiencies.

Maps, Plans, Cross Sections of Mining Operations

This matter was addressed during the side by side review of the permit books in the Department's Price Field Office (PFO). At that time the "confidential" label was scratched out and initialed. Subsequent maps submitted to the PFO of missing copies of these maps V-17 through V-26 did not contain any label of "confidential".

Design Criteria and Plans

At this time, we do not understand the need to revise narrative to include further references to "best technology currently available." As noted in your letter, "the applicant describes strategies and techniques in Chapter II, IV and VI for protecting wildlife and habitat and controlling sediment to receiving streams."

Review of text narrative within Chapter IX, "FISH & WILDLIFE RESOURCES" states on Page 3 that Consol will employ to the "best practical technology". Following paragraphs on that page delineate and explain some of the mitigative measures to be employed to minimize impacts to fish and wildlife.

Midterm Permit Review
ACT/015/015
November 23, 1998
Page 2

Furthermore, Chapter II, page 28 & 29 discuss "best practical management practices" to include mitigation measures of archeological sites, contamination of aquifer, soil storage stockpiles, revegetation of plant species, follow recommendations from the Utah Department of Wildlife Resources to insure minimal impact on fish & wildlife, subsidence monitoring and water spraying to control air pollutants.

Bonding & Insurance Requirements

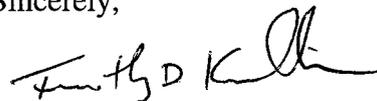
We are at this time unable to supply these costs in the standardized format the Division is requesting. Our office does not possess a copy of the procedures outlined in the OSM reclamation handbook (TSR-1). We have inquired with the Division by telephone for samples of these procedures earlier this month but have yet to receive this information. Request for this OSM directive is not yet available on OSM home internet page. An e-mail request has been made to OSM for a copy of the stated handbook.

Reclamation cost estimates have been updated to reflect 1998 costs. The cost per yard were derived from Consol's Mine Closing Costs. These costs are updated annually by the operations to reflect their best cost estimates for demolition & removal, backfilling, sealing, grading and revegetation of disturbed areas.

The demolition costs contain volume of foundations, flooring, footings and piers associated with the various structures. Permit application under Chapter III, Page 8 states that structures that are salvageable will be sold and removed; all other structures will be razed and disposed of in an environmentally sound manner. Surface debris (coal fines, pavement material, etc.) will be removed and deposited in the abandoned underground mine workings. and sealed from outside exposure or buried at another suitable location.

If you have any questions concerning the submitted information, please call me at 618-625-6847

Sincerely,



Timothy D. Kirschbaum
Environmental Engineer